

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

----- X	:	
STEVEN G. WICKS,	:	
GERALD A. KALBFLEISCH, and	:	
MICHAEL and MYRTLE HATHAWAY	:	
	:	
Plaintiffs,	:	
	:	Civil Action
v.	:	No. 04-CV-10988-(GAO)
	:	
PUTNAM INVESTMENT	:	
MANAGEMENT, LLC and	:	
PUTNAM RETAIL MANAGEMENT, LLP,	:	
	:	
Defendants.	:	
----- X	:	

**JOINT MOTION FOR ENTRY OF AN
ORDER FOR THE PROTECTION AND EXCHANGE OF
CONFIDENTIAL AND HIGHLY CONFIDENTIAL INFORMATION**

The Parties jointly move this Court for entry of an Order governing the protection and exchange of confidential information in this action in the form attached hereto as Exhibit A (to which the parties have stipulated). As grounds therefor, the parties jointly state as follows:

1. Discovery in this matter is proceeding consistent with the schedule set forth by this Court during the hearing in this matter on September 22, 2005.
2. The parties anticipate that discovery in this action may involve disclosure of material that is contended by one or both of the parties to be Confidential and/or Highly Confidential Information.

3. Entry of the Stipulation And Order For The Protection And Exchange Of Confidential And Highly Confidential Information, attached hereto as Exhibit A, will facilitate discovery of such Information, and will thereby assist in the resolution of this action.

Dated: November 4, 2005
Boston, Massachusetts

Respectfully submitted,

/s/ David E. Marder
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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Scott T. Lashway, hereby certify that on November 4, 2005, I caused a true copy of the Joint Motion for Entry Of An Order For The Protection And Exchange Of Confidential And Highly Confidential Information to be served by facsimile upon counsel for Plaintiffs, David E. Marder, Esq., of Robins, Kaplan, Miller & Ciresi, L.L.P., 800 Boylston Street, Suite 2500, Boston, Massachusetts 02199, and by Federal Express to Thomas R. Grady, Esq., Ackerman, Link & Sartory, P.A., 220 Lakeview Avenue, Suite 1250 - Esperante, West Palm Beach, FL 33401.

Dated: November 4, 2005

/s/ Scott T. Lashway
Scott T. Lashway